

1 LESLIE MARK STOVALL, ESQ.
Nevada Bar No. 2566
2 ROSS MOYNIHAN, ESQ.
Nevada Bar No. 11848
3 STOVALL & ASSOCIATES
2301 Palomino Lane
4 Las Vegas, NV 89107
Telephone: (702) 258-3034
5 E-service: court@lesstovall.com
Attorney for Plaintiff
6

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 ROBERT BARCELON, an individual)

Plaintiff,)

10 vs.)

11 LANDFORCE CORPORATION)

Individually; ALBERT LEON HARRIS,)

12 Individually; DOES I-X and ROE)

CORPORATIONS I-X, inclusive,)

13 Defendants.)
14)

Case no.: 2:18-cv-01493-GMN-DJA

15 **STIPULATION AND ORDER TO EXTEND PLAINTIFF'S TIME**
TO RESPOND TO DEFENDANTS' FOUR MOTIONS
FILED WITH THE COURT AS DOCUMENTS 68, 69, 70, 71
16 **(Second Request)**

17 COMES NOW plaintiff, by and through his attorney, Ross Moynihan, Esq. of the law
18 office of Stovall & Associates, and defendants Landforce Corporation and Albert Leon Harris,
19 by and through their counsel of record Michael C. Mills, Esq. of the law firm of Bauman Loewe
20 Witt & Maxwell and hereby enter into the following stipulation regarding the defendants' four
21 motions filed on April 16, 2020 as documents 68, 69, 70, 71. Plaintiff's original response filing
22 date was April 30, 2020. This is the second request for an extension of plaintiff's time to respond
23 to these motions, the first was made by unopposed motion filed by plaintiff's counsel on April
24

30, 2020 as document 73, and requested an extension of time from April 30, 2020 to Monday May 4, 2020. The unopposed motion was granted by the court on May 1, 2020 (document 74). Plaintiff requires an additional period of time to respond to the motions and upon plaintiff's request, defendant has agreed to the additional extension. As a result, it is hereby

STIPULATED AND AGREED that plaintiff's time to respond to the defendants' four motions filed on April 16, 2020 as documents 68, 69, 70, and 71 be extended from May 4, 2020 to May 11, 2020.

Dated this 4th day of May, 2020

Dated this 4th day of May, 2020

STOVALL & ASSOCIATES

Bauman Loewe Witt & Maxwell, PLLC

/s/ Ross Moynihan

/s/ Michael C. Mills

ROSS MOYNIHAN, ESQ.
Nevada Bar No. 11848
2301 Palomino Lane
Las Vegas, NV 89107
Attorneys for Plaintiff

Michael C. Mills, Esq.
Nevada Bar No. 3534
3650 N. Rancho Dr., Ste. 114
Las Vegas, NV 89130
Attorney for Defendants

ORDER

NOW THEREFORE, based upon the above stipulation of the parties and for good cause appearing, it is hereby

ORDERED that plaintiff's time to respond to the defendants' four motions filed on April 16, 2020 as documents 68, 69, 70, and 71 be extended from May 4, 2020 to May 11, 2020.

IT IS SO ORDERED

DATED this 5th day of May, 2020.


UNITED STATES MAGISTRATE JUDGE